



Code of Ethics



Global Edition

DRAXTON®



INTRODUCTION

With the aim of preserving and maintaining a culture of respect, honesty and adherence to the law, GIS has a Code of Ethics, a document that provides us with a referential framework for the behavior and actions expected of all collaborators, directors, customers and suppliers. All GIS collaborators have the responsibility to read, understand, implement, know and make the Code of Ethics known, therefore, it is important to go to your immediate boss if you have any questions related to it and to report any breach behavior.

DRAXTON



7th Edition

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MESSAGE FROM THE CEO

I am very pleased to present to you the current GIS Code of Ethics. In this new version, we provide more information on the topics of Human Rights, Social Responsibility, Diversity and Equality of people, however, the basic principles and our values are the same. Our Code of Ethics is a statement of the highest standards of integrity in everything we do, and that unites all of us who form part of GIS, under values that guide us in all our actions and decisions.

Since its foundation more than 90 years ago, at GIS we have been distinguished for promoting a culture of ethics and integrity, a healthy coexistence and treatment among our collaborators, as well as towards our customers, suppliers, and the communities in which we operate.

I invite you to read our Code of Ethics carefully and to refer to it frequently as a guide. Likewise, to promote it among your colleagues, customers and suppliers, and to use the channels we have established to inform us if you have any concerns about any inappropriate behavior that you observe.

We have a central Integrity Committee, as well as local Committees in the business units, who will support you in everything related to matters related to this Code of Ethics.

I am confident that our commitment to ethics and integrity will continue to be our guide to profitable growth and sustainable GIS.

P. Eng. Jorge Rada
President

APPLICATION AND SCOPE

This GIS Code of Ethics is of general application for all collaborators in any country where GIS has operations, at all organizational levels, including advisors, suppliers and clients. GIS expects that its clients and suppliers act ethically in accordance with the GIS Code of Ethics, that they communicate it in a timely manner among their collaborators and in case of identifying any situation of breach, notify it immediately in the means available for each Country (see back cover of the Code of Ethics of GIS or on the website www.gis.com.mx).

To ensure knowledge of the Code of Ethics and the identification of possible breach situations, we have online training available at: <https://degreed.com/courses/c-digo-de-etica?d=29062752&orgsso=gis> which is aimed at both new collaborators, as well as GIS collaborators to run it on a regular basis. The objective of this course is that behaviors that are not acceptable in the company can be identified and thus, be able to report them.

GIS INTEGRITY PROCESS

It is a set of tasks that are carried out in a systematic and standardized way in GIS to promote the experience of values and adherence to the GIS Code of Ethics.

A code is understood as the organized and systematized set of rules and behaviors in a community. Ethics is the branch of philosophy that deals with the study of morality, virtue, duty, happiness and good living. Integrity, from an ethical point of view, is the way of managing oneself congruently and coherently with personal values shared with the community to which one belongs.



THE COMMITMENT THAT GUIDE US

GIS is committed to establishing responsible and transparent business practices, free from corruption and bribery, as well as practices that do not infringe human rights and align with the various standards of business conduct, these include: **The Universal Declaration of Human Rights and The Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work.**

If any part of this Code of Ethics goes against local rules or laws, then the local rule or law must always be followed. GIS is and will be respectful of the applicable laws in each country.

HUMAN AND LABOR RIGHTS

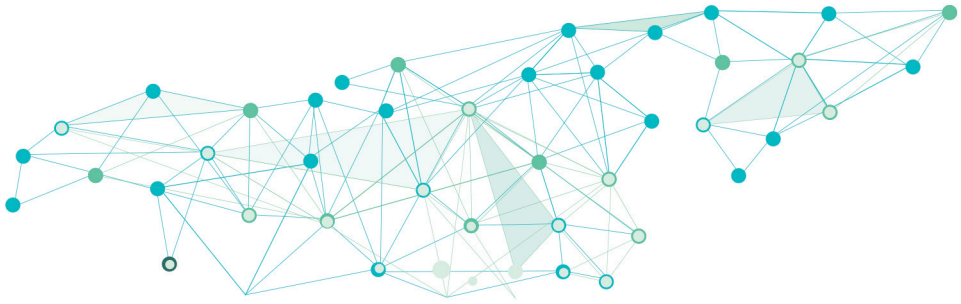
GIS is committed to the Universal Declaration of Human Rights of the United Nations (UN) as well as the Declaration of the International Labor Organization on fundamental principles at work, of which we highlight the following:

- All human beings are born free and equal in dignity and rights and, endowed as they are with reason and conscience, they must behave towards one another in a spirit of brotherhood.
- We promote a workplace without discrimination, without any type of harassment or retaliation.

- Every individual has the right to liberty and the security of his person. Slavery and human trafficking is prohibited in all its forms.
- The rights of people to freedom of association, collective bargaining and peaceful assembly are recognized.
- Demonstrate an ethical culture through our actions and conduct.
- Respectful treatment among collaborators.
- The hiring of minors is prohibited, as well as child or forced labor in our operations.

INDUSTRIAL AND INTELLECTUAL PROPERTY AND AND BUSINESS SECRETS

GIS is committed to the protection of the Intellectual and Industrial Property and business secrets, both its own and third parties. Consequently, all collaborators must respect the legitimate holders of such rights and protect the information, obtaining in each case, the licenses or corresponding authorizations.



SOCIAL RESPONSIBILITY

Social Responsibility GIS participates through the GIS Foundation with non-profit institutions, decentralized organizations and trusts that provide social, environmental and economic services to promote and generate social welfare.

GIS is respectful that its collaborators participate in political processes.

GIS is a non-partisan company and does not make contributions for the benefit of any political party.

DIVERSITY AND INCLUSION

GIS respects the diversity and equality of people, we believe and accept that all people are unique, with different talents, for this GIS does not tolerate discrimination either because of beliefs, race, religion, gender, gender identity, sexual orientation and identity, origin, nationality or any other human condition.

COMMUNICATION POLICY

GIS has several communication channels with those around us (shareholders, investors, partners, clients, employees, unions, suppliers, consumers, neighbors, the media, churches, social clubs and non-governmental organizations, among others), it is our responsibility to timely and responsibly communicate ideas, concerns and/or assertions in a clear, precise and honest way, as well as to obtain and provide feedback that serves to preserve and improve the image of GIS both internally and externally.

Objective

Ensure that communication occurs effectively and efficiently, that the information is truthful, pertinent, timely, accurate and flows between the people to whom it is relevant.



EXAMPLES OF BREACH:

- Discredit, distort, hide or delay information about the business situation or upon which decisions are based on its course .
- Act as a spokesperson for GIS and its companies without the necessary authorization.
- Failure to comply with the guidelines of the identity manuals for the dissemination of company logos and brands.
- Ignoring the requirements for the dissemination of relevant business information.
- Deliberately lying when reporting a concern or breach of the Code of Ethics, or in an investigation and/or clarification process.
- Being aware of a violation of the Code of Ethics and not communicating it.

EMPLOYMENT POLICY

At GIS, the job opportunities that arise are managed fairly and are available to all staff, there is no discrimination based on ethnic or national origin, gender, age, disability, social status, health conditions, religion, opinions, sexual preferences or marital status, skin color, physical appearance, immigration status, pregnancy, language, identity or political affiliation or any other that violates human dignity. The selection of the candidate is based mainly on the job skills required in each position and on those aspects related to professional performance, as well as the affinity with the GIS values of the collaborator or candidate.

Objective

This policy is of general application for all GIS companies; contains the principles that must be observed to provide employment and development opportunities to the collaborator or candidate for collaborator, based on professional performance, work skills and compliance with the Code of Ethics.



EXAMPLES OF BREACH:

- Omitting the publication of vacancies in accordance with the Procedures Manual GISPROC-RH-026 Identification of Talent (exceptions).
- Showing favoritism by providing opportunities for growth and development.
- Hire people from a single source of studies (school, university, college).
- Create groups of preferences, without considering people from other companies or businesses.
- Promise future promotions to employees in exchange for refraining from participating in selection processes.
- Prolong the time established by the institutional procedure for the collaborator to join the new position, without a reason that justifies it.

HOSTILE ENVIRONMENT POLICY

GIS promotes a work environment in which the dignity of all its employees is respected, without exerting pressures other than those required by company operations. At GIS, respect for people, company resources, institutions, the environment and society is essential.

Objective

GIS does not tolerate discriminatory actions or behaviors that offend the dignity of the person or provoke a hostile working environment.



EXAMPLES OF BREACH:

- Using physical or verbal language, hidden or open, that offends the dignity of the person, makes them uncomfortable or causes a hostile working environment.
- The use of nicknames.
- Discriminating based on ethnic or national origin, gender, age, disability, social status, health conditions, religion, opinions, sexual preferences or marital status, skin color, physical appearance, immigration status, pregnancy, language, identity or political affiliation or any other that violates human dignity.
- Addressing unfair and hostile behavior towards collaborators inside and outside GIS facilities.
- Making explicit or demeaning comments about a person's physical appearance.
- Using the job hierarchy for matters other than work; for example, attend bosses' personal affairs.

SEXUAL HARASSMENT POLICY

At GIS we prohibit, condemn and denounce all types of harassment and sexual harassment inside and outside the workplace. Considering the above, GIS prohibits and punishes any action or situation of sexual harassment.

Objective

All employees are responsible for ensuring that the work environment is dignified and free of verbal, physical, psychological insinuations and sexual harassment.



EXAMPLES OF BREACH:

- The use of physical or verbal language, hidden or open, that offends the dignity of the person, makes the person uncomfortable or causes the person to feel harassed.
- Exhibiting images of sexual content, text messages or offensive emails in any business area.
- Requesting sexual favors in exchange for any benefit.
- Making indecent proposals and jokes of a sexual nature. Behaviors that may be offensive towards third parties such as intimidation or defamation.

CONFLICT OF INTEREST POLICY

This policy is of general application for the companies that make up GIS, it establishes the guidelines to prevent situations of conflict of interest, in such a way that the personal interests of the GIS Collaborators do not influence decision-making, and that these are taken in the best interest of GIS, within a framework of transparency and impartiality and, in the event that such conflicts arise, deal with them in an ethical and responsible manner, and report them; it also includes guidelines that facilitate decision-making aimed at preventing situations in which the interests of collaborators enter or may be in conflict with the interests of GIS, so that the Collaborators will not take as their personal benefit the business opportunities that arise for GIS in the performance of their functions.

Objective

GIS considers the private life of its Collaborators as something strictly personal, however, GIS establishes that the Collaborators must avoid situations in which their personal interests may be contrary to the interests of GIS.

It is the obligation of the Collaborators to inform in writing to the management to which they report or through the official means of GIS any situation that does not comply with this Policy.

EXAMPLES OF BREACH:

- Failure to communicate any situation of conflict of interest in which the collaborator is involved, either directly or indirectly.
- Failure to communicate situations of conflict of interest in which other GIS people are involved.
- Using the assets, or company resources that GIS provides, as well as work time to attend to personal matters or to benefit third parties that are not GIS, or discredit the good name and reputation of GIS.
- Providing advice or help to companies that market products or services that directly compete with GIS, or to those that are providers or clients of GIS.
- Working for these companies acting as a Collaborator, Consultant, Member of their Council or another position (see details of GIS-ADM-001 CONFLICT OF INTEREST exceptions).





EXAMPLES OF BREACH:

- If GIS Collaborators produce, market or distribute items that compete with the products that GIS produces or distributes.
- When GIS collaborators who run in their own business and whose line of business is related to the functions of their position in GIS, must report it in detail through the **Survey of Possible Conflicting Interests** and deliver it to the Management or Direction of the Talent and Business Culture area for its evaluation and the issuance of a recommendation on the case.
- Being representatives, collaborators, commission agents, shareholders, partners, advisors, etc; of companies that compete or provide goods or services to GIS.

EXAMPLES OF BREACH:

- Influencing or carrying out operations with suppliers, clients or any third party with whom they have a blood family relationship in the first or second degree (grandparents, parents, children, grandchildren, siblings, uncles, cousins and nephews), by political affinity (spouse, partner, in-laws, brothers-in-law, brothers-in-law, sons-in-law and in-laws) or friendship.
- Collaborators and any member of their first-degree family must not give or accept money, commissions, additional discounts to the general ones in the market, gifts or benefits of any kind that come from suppliers or clients of GIS, with the exception of those gifts with promotional character or personal attention with a value of less than \$30 US dollars and provided that in the year they do not exceed \$100 US dollars, except for invitations to events or activities that have prior authorization from the management to which they report.
- The pre-existence of a friendly relationship between a GIS collaborator and any representative of another company with which GIS has a business relationship, does not relieve the collaborator of compliance with this policy.

EXAMPLES OF BREACH:

- For cases in which there is a sentimental relationship after the hiring between collaborators within the same work area or depending on the organization chart, they must inform the Business Talent and Culture area to document and sign the Possible Conflict of Interests questionnaire. (Annex II / Format available on sharepoint / Policies and Procedures / Integrity)
- Collaborators must not carry out work for external persons or companies during their working day, or during the time corresponding to a paid leave granted to resolve personal matters.
- Acquire products from GIS companies to market them, except in those cases where collaborators are explicitly invited and authorized by the Business Management to market company products.
- Make use in their own name and for personal benefit of patents, inventions, improvements, innovations and developments made by GIS personnel, since, in accordance with Mexican laws and those of each country, these are the property of GIS.

EXAMPLES OF BREACH:

- Collaborators who intentionally incur in situations of Conflict of Interest or commit any violation of this policy will be sanctioned in accordance with the disciplinary measures provided for in the corresponding Internal Work Regulations, without prejudice to the exercise of the corresponding legal actions. Possible conflicts or infractions of the policy will be reviewed, analyzed and ruled by the Central Integrity Committee, who must notify the Audit Committee so that it informs the Board of Directors of this type of incident. Have commercial operations between GIS and former Collaborators (Note exceptions).
 - a. Those who were separated from GIS for a serious cause and/or who have incurred in breaches of the Code of Ethics.
 - b. When six months have not elapsed since the separation of the Collaborator, and said separation has been due to voluntary resignation or personnel readjustment. Collaborators must fill out the "Survey of Possible Conflict of Interest" (Annex II) sent annually by the Internal Audit Department, and return it signed (manually or electronically) 15 calendar days after receiving it. The information received will be treated confidentially.
- Collaborators may not attend events or accept invitations from customers or suppliers, except when authorized by the Management or Functional Directorate to which the collaborator reports and that such attendance is for the purpose of establishing a better business relationship and contributing to the interests of GIS.
- In cases where attendance at events is authorized (seminars, meetings, exhibitions, presentations, among others), all intrinsic expenses must be covered by the GIS Business in which the collaborator works.

QUALITY FOCUSED TO CUSTOMER SATISFACTION POLICY

For GIS it is very important to know and satisfy the needs of our clients, as well as fulfill with the conditions, specifications and level of service agreed, for this reason, our priority is to offer them the best service and always treat them with dignity and respect. Quality in GIS is a fundamental principle in all operations, transactions and services that we perform.

At GIS we implement and maintain quality assurance processes in manufacturing and/or marketing to minimize the risks of falsification of the materials we use and of the products we ship to our customers. In the same way we must comply with the requirements that the operational and administrative technology demands from a world-class company.

Objective

Satisfy with quality the requirements and standards determined by our internal and external Clients.

QUALITY FOCUSED TO CUSTOMER SATISFACTION POLICY

EXAMPLES OF BREACH:

- Failing to alert a customer about current and/or potential problems that our products may cause.
- Neglecting the complaints of our clients, without giving them a timely and effective response.
- Failure to establish measurements, standards and adherence to procedures and parameters in GIS processes.
- Failure to comply with the specifications and inspections required by our quality systems or required by customers.
- Failure to comply with the requirements and standards established by official regulations.
- Modify or alter reports of test and inspection results or product performance.



SAFETY, OCCUPATIONAL HEALTH AND ENVIRONMENTAL PROTECTION POLICY

For GIS, the physical and mental integrity of all collaborators, as well as the care and conservation of the environment and its assets, are priorities, therefore, by observing, identifying and complying with the principles to be exercised for the prevention of accidents and impact on the environment, we make use of our rights and act responsibly. Likewise, GIS collaborates with the authorities to fully comply with laws and regulations on environmental protection.

Objective

Strengthen the commitment assumed by GIS to have safe facilities and processes that avoid injuries and risks to people and that affect company assets or the environment.



EXAMPLES OF BREACH:

- Perform unsafe acts.
- Failing to point out unsafe conditions in the workplace.
- Carry out work ignoring established safety procedures.
- Stop attending safety training.
- Incorporate new personnel to the company, change departments or jobs to a person or group of people without first instructing them on the principles and procedures of safety, occupational health and the environment.
- Avoid participating or falsifying reports in investigations of accidents or incidents.
- Use, consumption and possession of drugs and the carrying of prohibited objects within the company.
- Failure to comply with safety, occupational health and environmental protection regulations established in companies and by law.

BUSINESS PRACTICES POLICY

When conducting business, everyone who we participate in this process, we must ensure to comply with applicable laws and trade treaties in force in the countries where we have operations, as well as in all export activities and imports, where GIS complies with all regulations according to the applicable legislation. Secure compliance with safety guidelines in the logistics chain to prevent terrorism and drug trafficking according to GIS policies.

For GIS it is essential to fulfill the commitments agreed with our clients.

Objective

Abide by the laws and regulations of the different nations where GIS has a business relationship.



EXAMPLES OF BREACH:

- Failure to comply with the commitments established in the contracts, whether in terms of time, quantity or price, without the consent of the counterparty and the required internal authorization.
- Reveal information from one client to another (e.g. consumption, business terms) that may affect the commercial relationship with the company.
- Take the daily dealings with customers and suppliers to a more personal relationship that can compromise the interests of the company.
- Transporting illegal merchandise (eg drugs) in finished product shipments to customers.
- Hold talks or agreements with competitors in relation to prices, volumes, sales to customers, etc.

SUPPLIER RELATIONS POLICY

In all commercial practices, for GIS, relationships with our suppliers occupy a very important place, which is why they must be selected taking into consideration the corresponding policies and procedures, under strict standards of competence and professionalism and with the premise of establishing relationships long term. In order to prevent unacceptable conduct, GIS distributes the Conflict of Interest Policy to the knowledge of all its suppliers and makes the means of reporting available as a communication and transparency measure (annual process).



EXAMPLE OF BREACH:

- Influence those who make decisions for suppliers to alter their impartiality and objectivity.
- Accepting gifts, except for promotional items, accepting gratuities as well as invitations with purposes other than establishing a business or professional business relationship.
- Provide subordinate or professional services to a supplier.
- Request or accept favors, discounts, special terms or conditions from current or potential GIS providers, for their own benefit or that of third parties, except in the case of agreements of general application for all GIS personnel.
- Accept invitations from suppliers, except in the case of generalized events for their clients.
- Request donations from suppliers for charitable institutions, except as authorized by the Gis Presidency of the Board of Directors, leaving the suppliers free to participate.
- Failing to provide, due to a provider's dissatisfaction, the instances available so that they can report possible treatments of improper order by any member of the GIS company.

MONEY LAUNDERING AND BLEACHING OF CAPITAL POLICY

Money laundering or capital bleaching is incorporating ill-gotten money into businesses to clean its origin, this has become a way of introducing income from organized crime in legal operations. For this reason, in GIS, all registration to the catalog of clients or suppliers, including contractors and service providers, requires the approval of the Finance or Supply area, as the case may be, who must ensure their financial and moral solvency. . Payments and collections must be made using the means of the financial system and in no case GIS must pay or collect money in cash.

Objective

Prevent the participation of GIS and its companies in money laundering / capital bleaching, making sure that we know well every individual or legal person with whom we do business, mainly our partners, customers and suppliers, in addition to being attentive to all the warning signs that arise.

EXAMPLES OF BREACH:

- Pay by check or electronic transfer to the bank account in the name of a person or company that does not correspond to the registered supplier.
- Collect payments by check or electronic transfer from a bank account other than the one registered in the customer profile.
- Receiving payment by check or electronic transfer of foreign origin for domestic clients who were billed in pesos, dollars or in the legal currency of the country.
- Pay or collect in cash.



INFORMATION AND RECORDS CONTROL POLICY

All records of information related to ours, whether they are accounting, financial or other operations, when they are truthful and timely, allow correct and timely decision-making. Likewise, this information facilitates the full compliance with our business obligations, including tax obligations, and in the same way allows us to demand our rights. Furthermore, GIS is required to provide information from records of people outside the company, with whom we have a commitment that such information is accurate and timely.

Objective

Abide by strict adherence to policies, internal guidelines, accounting principles, laws and regulations related to the calculation, registration, reporting and distribution of financial information of GIS companies.



EXAMPLES OF BREACH:

- Alter reports of any kind.
- Pressure the finance areas to report financial statements without adhering to the applicable standards and principles.
- Authorize and instruct the making of accounting records that do not adhere to the internal policies of GIS.
- Providing erroneous or incomplete information to the finance areas that prevents them from correctly applying the corresponding accounting principles or tax regulations.
- Failure to comply with current tax provisions.

PROTECTION, USE AND PRIVACY OF CONFIDENTIAL / PRIVILEGED INFORMATION POLICY



PROTECTION, USE AND PRIVACY OF CONFIDENTIAL/ PRIVILEGED INFORMATION

All the information to which we have access and with which we work in our day to day is confidential. Confidential information, is that which is not known to our competitors, the public and other third parties outside GIS, such as financial, commercial, technological information, related to designs and processes, product prices, raw materials, costs of production, margins, sales volume, income, expansion plans, strategies, payroll and decisions made by GIS' management bodies, among others, that is owned by GIS or that is obtained, generated and developed by its collaborators, bosses, directors and shareholders as a result of their activities, regardless of whether it is recorded in writing, electronically or otherwise. In case of doubt as to whether or not the information is confidential, it should be presumed that it is.

Its management and use must be carried out responsibly and only to fulfill the functions related to the area of responsibility that each of us has entrusted, since this information is a valuable asset and can be critical as a competitive advantage of GIS over its competitors. Therefore, it must be safeguarded and made good use and management of it, and it must not be disclosed for any reason, except for any requirement of any authority (competent government) that requests it in writing, and its delivery must have the authorization of the legal area of GIS and the immediate boss of the person who will deliver it.

All information GIS has already made public, whether through postings of relevant events, press releases, articles or advertising, will not be considered confidential.

At GIS we respect the privacy of our collaborators, clients and suppliers, as well as the information entrusted to us by third parties. The personal information that we collect, we must use and dispose of it in a responsible way and under the same rules as GIS information.

The Company is responsible for safeguarding the personal data of its collaborators and adhering to the provisions of the applicable laws, for more details on how this information should be handled, please consult the GIS Policy regarding the Protection of Personal Data. Regardless of the foregoing, sharing confidential information may constitute a crime and be severely punished. Sharing certain information with competitors is strictly prohibited.

USE OF PRIVILEGED INFORMATION

GIS is a public company whose shares are listed on the stock market. All of us who work at GIS must conduct ourselves with integrity in all their affairs, including complying with applicable stock market laws, so we do not tolerate the use of privileged information (insider trading).

The use of privileged information means to perform operations with values based on information that has not been made public knowledge through media that the stock exchange in which they are listed establishes for that purpose, and that influences or may influence prices of such securities or is considered important by an investor in determining whether to buy, sell or hold the securities (Inside Information). Sharing that information in order to allow another person to use said information to carry out operations with GIS values based on it (tipping) or related to any sale or purchase transaction, is also prohibited and penalized.

PROTECTION, USE AND PRIVACY OF CONFIDENTIAL/ PRIVILEGED INFORMATION

Some examples of Inside Information include, among other things, sales and earnings estimates or results or other financial information, plans to expand into new markets, potential mergers, acquisitions, bids, joint ventures or changes in assets, introduction of new products or significant services or business development, changes in control or senior management of GIS and certain events in significant litigation, among others.

Any person who has Privileged Information has the obligation to safeguard and refrain from using or transmitting it, except that (I) due to their employment, position or commission, the person to whom it is transmitted must know it, for which said person must sign a confidentiality agreement and; (II) when required by any competent authority in the terms provided in the applicable legislation, in which case you must communicate said request in writing to your immediate boss as well as to the legal department of GIS.

In the event of improper or unfair use of Privileged Information against GIS, any person who becomes aware of it must immediately report said circumstance to their hierarchical superior if they are an employee of GIS or to the Board of Directors, if it is of any of its members.

EXAMPLES OF BREACH:

- Share privileged or confidential information with third parties without prior authorization.
- Disseminate information about relevant events, before they have been published to the market.
- Neglecting the protection and conservation of privileged or confidential documentation, whether written or electronic.
- Neglecting or putting at risk the security of databases that contain confidential information of employees and shareholders.
- Transfer personal data to companies, organizations or persons external to GIS without the express consent of the owner.
- Buy, sell or recommend directly or indirectly the purchase or sale of GIS shares when there is knowledge of relevant events that have not been disclosed to the market.
- Recommend any transaction for the purchase or sale of company shares.

EXAMPLES OF BREACH:

- Share confidential information with consultants, advisors or suppliers of any kind, without previously signing a confidentiality agreement and without the corresponding authorization.
- Using or allowing third parties to use information that is considered private property of any GIS company for personal gain.
- Subtract, copy or deliver information related to the company to any person without written authorization.

ANTI-CORRUPTION POLICY

Throughout the world, corruption is considered a crime, in addition to being contrary to fair competition and harming the economic stability and reputation of the company, which is why GIS prohibits its employees, managers, directors and any entity that works in their name or representation, offer, promise or give objects of value directly or indirectly illegally, either to government officials or private entities in order to obtain any type of benefit.

Objective

The collaborators, managers, directors of GIS and any entity that works on its behalf or representation, must always and fully comply with all applicable anti-corruption laws or regulations, adapting with what is culturally accepted in the countries where it operates, honoring the value of honesty at all times.

EXAMPLES OF BREACH:

- Offering money or anything of value to any person to influence or pressure them.
- Promising job opportunities or any favor in exchange for making a profit.



DISCIPLINARY MEASURES

Failure to comply with the GIS Code of Ethics implies that disciplinary measures may be taken according to the seriousness of the facts.

GIS expects us to comply with and enforce the Code of Ethics, live the values, honor company policies and respect the laws of the country where we operate.

The application of these disciplinary measures may involve:

- Verbal warning.
- Call of attention in writing with a copy to the collaborator's file.
- Temporary suspension.
- According to the seriousness, it could lead to termination of contract / dismissal.
- The above is according to the feasibility of application in the different countries where GIS has operations.

No Retaliation

GIS does not allow any type of punishment, disciplinary action or retaliation against any person who, in good faith, raises a concern of unethical business conduct. Retaliation is grounds for disciplinary action, including termination. If you know or suspect any retaliation or you are experiencing any type of retaliation against you, you must report it.

INTEGRITY COMMITTEE

What is it and how does it work?

In order to ensure compliance with the GIS Code of Ethics, as well as to analyze, clarify and, where appropriate, determine the sanctions applicable to the faults that have been committed, the operation of the GIS Integrity Process has been implemented, which consists of a Central Committee and local Committees in each of the GIS companies. These Committees are made up of collaborators who, under different roles, are willing to listen and attend to the complaints that are reported for non-compliance with the GIS Policies.

The Committee and the people who make it up, have the obligation to protect the information confidentially, as well as the identity of the people who make a complaint, they are also responsible for initiating the procedure for the investigation of the reported facts and for proposing, if necessary, the corresponding sanctions.

ROLES OF THE INTEGRITY COMMITTEE



Champion (Leader) Drives and promotes the establishment of the Integrity Process and the continuity of its operation.



Ombudsperson (Defender) Listens and guides employees about their doubts about integrity and ensures that complaints or reports are addressed and appropriate actions are taken.



Senior Officer (Compliance Agent) Verifies compliance with policies, as well as the operation of the Integrity Process.



Administrator Keeps the records, controls and documentation of the activities of the Committee, this person is the direct communication channel with the Central Committee of GIS.



Process Integrity Execution Manager Ensures Process Integrity operates across GIS in a standardized manner.

WHAT HAPPENS WHEN YOU REGISTER A COMPLAINT?

All complaints are received, recorded and given a folio of identification. This is done by someone external for the following reasons: security, confidentiality and transparency of the information.

Then they go to GIS directly to the Central Committee. Here they are analyzed to subsequently start an investigation into the reported facts.

According to the reported situation, who should carry out the investigations is defined.

Integrity
Committee

Internal Audit

GIS Central
Committee

When the investigation is finished, the findings are documented as well as the conclusions. In case of proceeding, a Letter of Recommendations or Report of the case is prepared, these results are shared with the Business Management, who must ensure that the recommendations are executed.

If the complaint proceeds, the people involved should receive sanctions according to the gravity of the facts.

If the complaint does not proceed, information is documented and guarded.

Important: be aware of the status of your complaint. To learn about the resolution, enter the system with the complaint number.

Remember that all information is kept strictly confidential.

INFORMATION NECESSARY TO MAKE A COMPLAINT

- 1 Country, location and facility where the complaint originates.
- 2 Register your name or if you prefer, register as anonymous.
- 3 Identify which Policy is being breached.
- 4 Describe in detail what, how, when and where the incident occurred, who is involved (name and position), and if they obtain any type of benefit. Include any information that may be valuable in the investigation and resolution of this situation.
- 5 Include names of people who have knowledge of the case, (involved and not involved in the complaint).
- 6 Indicate the name or trade name of the business, place where it happened, including address, or the location within the facilities. If the incident did not occur at the specific location, please provide details.
- 7 Were you present when the incident occurred? Did it affect you directly?
- 8 Enter the name(s) of the person(s) committing the offense and their position in the company.
- 9 Do you have any documents that support your claim? It can be an email, photographs, messages, any evidence you have, please share it.

- To make a complaint you can call, enter the page web, send an email or deposit your concerns in the company Integrity mailbox.
- If you prefer, approach the local committee.
- Contact information is located on the back of this Code of Ethics.

COMMITMENT LETTER- GIS COLLABORATOR

To be deliver to the company

Date _____

I _____ have received the GIS Code of Ethics, its explanation, as well as its use and application, which I have read and understood.

I commit to participate in the communication events related to this code, as well as to consult any type of doubt that I may have and to spread it among the personnel related to GIS.

I agree to comply with and enforce all GIS policies at any time and place.

I agree to report personally or anonymously any deviation from the GIS Code of Ethics that I observe, suspect or become aware of in any way.

At no time will I retaliate against any person who, in compliance with their responsibility, reports a breach of the GIS Policies.

Signature

Company



COMMITMENT LETTER- GIS SUPPLIER

Date _____

Company Name of the Client or Supplier

I _____ have received the GIS Code of Ethics, the explanation as well as its use and application, which I have read and understand. I undertake to notify personally or anonymously any deviation from the Code of Ethics that I observe, suspect or become aware of.

Signature

Company



FORMAT TO FILE A COMPLAINT

Date _____ Facility _____

City _____

Name _____ Anonymous ☐

Which of the GIS policies do you think is being breached?

Please describe in detail, how, when and where the incident occurred, those involved (name and position), include information that may be valuable in the investigation:

Name of the people who have knowledge of the case (involved and not involved with the complaint):

Place and facility where the incident occurred, including location within the facilities:

Were you present when the incident occurred? ☐ Yes ☐ No

Did it affect you directly? ☐ Yes ☐ No

Enter the name(s) of the person(s) committing the offense and their position in the company:

Do you have any document or any evidence (mail, photographs, messages, etc. that supports your complaint?
☐ YES (please send it) ☐ NO



GIS COLLABORATOR COMMITMENT LETTER

Date _____

I _____ have received the GIS Code of Ethics, its explanation, as well as its use and application, which I have read and understood.

I commit to participate in the communication events related to this code, as well as to consult any type of doubt that I may have and to spread it among the personnel related to GIS.

I agree to comply with and enforce all GIS policies at any time and place.

I agree to report personally or anonymously any deviation from the GIS Code of Ethics that I observe, suspect or become aware of in any way.

At no time will I retaliate against any person who, in compliance with their responsibility, reports a breach of the GIS Policies.

Signature

Company

INTEGRITY AND RESPONSIBILITY



- I **speak** with the truth.
- I **act** with honesty and transparency.
- I **am** consistent with the values of GIS.
- I **accept** the challenge of a problem and work for its solution.
- I **make** good use of resources.
- I **demand** of myself and I demand to comply with the commitments we make.

CUSTOMER ORIENTATION



- I **recognize** the needs and expectations of our clients.
- I **comply** with the conditions, specifications and level of service agreed with the client.
- I **recognize** our products and their benefits.
- **My** acts and decisions are based on customer satisfaction.

INNOVATION



- I **do** things differently to get better results.
- I **promote** creativity.
- I **am** open to listening and promoting new ideas that generate business growth.

HUMAN DEVELOPMENT

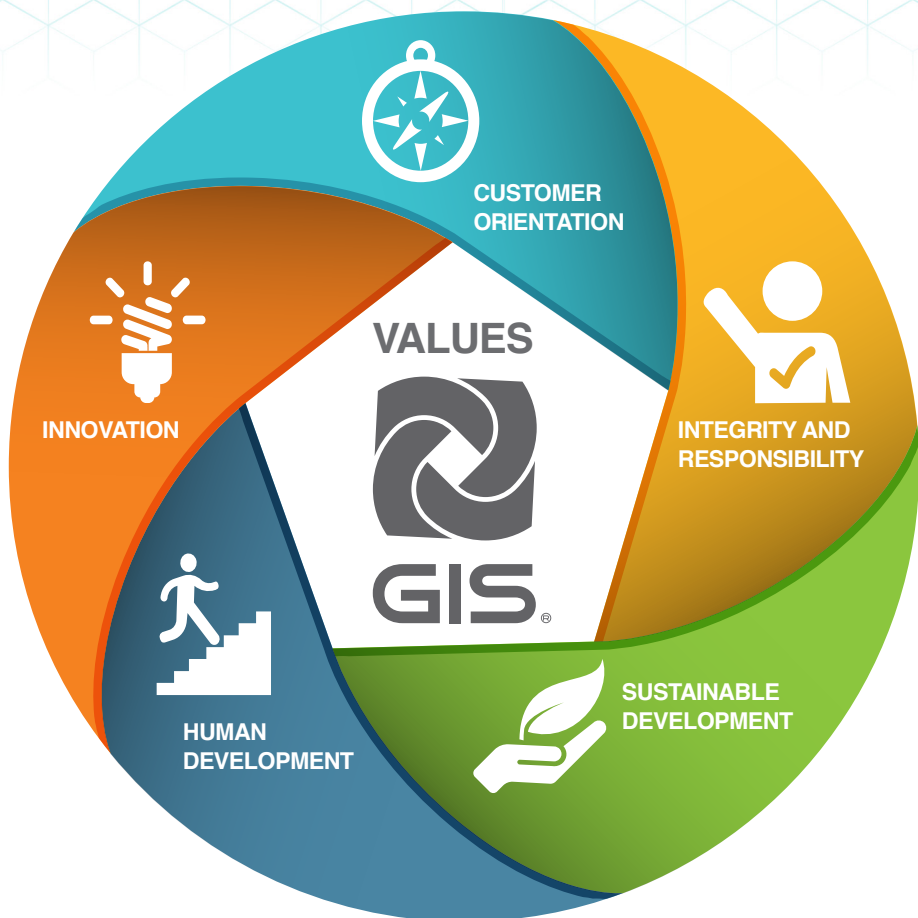


- I **am** responsible for my development.
- I **develop** the leadership and skills of my collaborators.
- I **promote** collaboration and teamwork.
- I **provide** the environment for the collaborator to reach their maximum potential and fulfillment.
- I **respect** human dignity.

SUSTAINABLE DEVELOPMENT



- I **take** care of the environment.
- I **take** care of raw materials.
- **We seek** the use of renewable energies.
- **We improve** the quality of life.
- **We satisfy** the needs of groups of interest.



Do you have a complaint?

• deposit • call • send

MEXICO

- ☎ 800 00 37 447
- ✉ reportalogis@tipsanonimos.com
comite.auditoria@gis.com.mx
- 🌐 www.tipsanonimos.com/reportalogis

UNITED STATES

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- 🌐 www.tipsanonimos.com/reportalogis

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- ☎ 40 08 80 14 96
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- 🌐 www.tip-offs.com

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